

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK**

KEDWIN PAYAMPS,

Plaintiff,

against

THE CITY OF NEW YORK; MAYOR BILL  
DE BLASIO; THE NEW YORK CITY  
POLICE DEPARTMENT (NYPD)  
COMMISSIONER DERMOT SHEA; NYPD  
CHIEF OF DEPARTMENT TERENCE  
MONAHAN; NYPD INSPECTOR JESSE  
LANCE; NYPD OFFICER COREY  
JOHNSON; FIRST NAME UNKNOWN  
("FNU") AUGUSTE (Tax I.D. 961629); and  
NYPD MEMBERS JOHN AND JANE DOES  
1-7

Defendants.

Case No.1:22-CV-00563-AMD-VMS

**INITIAL DISCLOSURES OF  
DEFENDANT JESSE LANCE**

Pursuant to Federal Rule of Civil Procedure 26(a)(1), Defendant Jesse Lance ("Lance"), through his undersigned counsel, makes the following initial disclosures to Plaintiff Kedwin Payamps. These disclosures are based on information presently known and reasonably available to Defendant Lance and which Lance reasonably believes he may use in support of his claims and defenses. Continuing investigation and discovery may cause Lance to amend these initial disclosures, including identifying other potential witnesses, documents and by disclosing other pertinent information. Lance therefore reserves the right to supplement these initial disclosures.

By providing these initial disclosures, Lance does not represent that he is identifying every document, tangible thing, or witness possibly relevant to this lawsuit. The disclosures herein are made without in any way waiving: (1) the right to object on the grounds of competency, privilege, relevancy, materiality, hearsay, or any other proper ground, to the use of any such information, for

any purpose, in whole or in part, in any subsequent proceeding, in this action or any other action; and (2) the right to object on any and all grounds, at any time, to any other discovery request or proceeding, including any request involving or relating to the subject matter of these disclosures.

Furthermore, these disclosures are not an admission by Lance regarding any matter.

All of the disclosures herein are made subject to the above objections and qualifications.

Lance reserves the right to supplement or amend these disclosures.

**Initial Disclosures Pursuant to Rule 26(a)(1)(A)**

**(i) The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

**RESPONSE:**

Defendant Lance currently believes that the following individuals are likely to have discoverable information relevant to the allegation in the Complaint. Lance does not have contact information for all of these individuals. **Wherever a below-identified witness's address, telephone number, and/or full name is not specified, it is because such information is not known to Plaintiff at this time.**

The below-listed witnesses are from the New York City Police Department, are current or former City employees, and/or have been in communication with one or more Co-Defendants to this action; their addresses, telephone numbers, and/or email addresses are therefore known to Defendants. Some have retired from the NYPD. The addresses of those who have retired are known to the NYPD pension section.

1. It is anticipated that the following individuals who worked for or closely with the NYPD at the relevant time period have knowledge of, *inter alia*: the events which are alleged to have occurred at all times relevant to the complaint:
  - a. Mayor Bill De Blasio
  - b. NYPD Commissioner Dermot Shea
  - c. NYPD Chief of Dept. Terrence Monahan
  - d. NYPD Assistant Chief Jeffrey Maddrey
  - e. NYPD Assistant Chief Brian Conroy (Ret.)
  - f. NYPD Officer Cory Johnston

**(ii) A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

**RESPONSE:**

Defendant Inspector Lance is not in possession of any responsive documents, as he is not required to maintain a memo book, and did not personally prepare or oversee the preparation of any reports in relation to the allegations in the Complaint. Additionally, Lance reserves the right to object to any request for production on any appropriate ground.

**Initial Disclosures Pursuant to Rule 26(a)(1)(A)**

**(iii) The name and, if known, the address and telephone number of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.**

**RESPONSE:**

Defendant Lance currently believes that the following individuals are likely to have discoverable information relevant to Lance's claims and Defendants' defenses. Lance does not have contact information for any of these individuals. **Wherever a below-identified witness's**

**address, telephone number, and/or full name is not specified, it is because such information is not known to Plaintiff at this time.**

The below-listed witnesses are from the New York City Police Department, are current or former City employees, and/or have been in communication with one or more Co-Defendants to this action; their addresses, telephone numbers, and/or email addresses are therefore known to Defendants. Some have retired from the NYPD. The addresses of those who have retired are known to the pension section.

1. It is anticipated that the following individuals who worked for or closely with the NYPD at the relevant time period have knowledge of, *inter alia*: the events which occurred at all times relevant in the complaint:
  - a. Mayor Bill De Blasio
  - b. NYPD Commissioner Dermot
  - c. NYPD Chief of Dept. Terrence Monahan
  - d. NYPD Assistant Chief Jeffrey Maddrey
  - e. NYPD Assistant Chief Brian Conroy (Ret)

**(iv) A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.**

**RESPONSE:**

Lance is not in possession of any responsive documents, as he is not required to maintain a memo book, and did not personally prepare or oversee the preparation of any reports in relation to the allegations in the Complaint. Lance reserves the right to object to any request for production on any appropriate ground.

Dated: White Plains, New York  
August 10, 2022

Respectfully submitted,

  
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*Counsel for Defendant*

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10th day of August 2022, a copy of defendant's foregoing Initial Disclosures was served via email upon the following:

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*Counsel for Plaintiff Kedwin Payamps*

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LA PIETRA & KRIEGER P.C.

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Defendants.

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JESSE LANCE**

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